

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
SAFA GELARDI**

SAFA GELARDI, hereby declares and verifies the truth of the following, under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States Code, Section 1746: 702350/2023

1. I am a defendant in the above-captioned matter, and I am fully familiar with the facts set forth herein. I make this declaration in compliance with this Court's Minute Order of February 21, 2024, directing me to provide a list identifying: (1) all real property in which I currently have an ownership interest; and (2) all real property in which I previously had an ownership interest that was sold or otherwise disposed of from February 1, 2022 to present.

2. I currently have an ownership in the following properties:

a. 9 Woods End, Lake Harmony Road, Pennsylvania. The current Zillow estimate market value for this property is \$508,000. It was purchased for \$315,000 on or about July 11, 2019.

b. 5265 Milford Road, East Stroudsburg, Pennsylvania. The current Zillow estimate for this property is \$556,500. Plaintiff's allegation in its letter motion requesting

an order of attachment that I had previously sold my interest in this property is false. I attach as Exhibit "A" copies of Monroe County Land Records showing that this property is currently owned by me and my husband.

c. 148 Clay Pit Road, Staten Island, New York. The market value for this property is approximately \$975,000 as evidenced by the contract of sale previously provided to the Court which was the product of an arm's-length transaction.

3. Since February 1, 2022, I have sold the property known as 1475 Moon Valley Drive, Champions Gate, Florida. The current Zillow estimate value for this property is \$809,000. It was sold on or about May 15, 2023, for \$760,000. It was purchased on or about December 27, 2021 for \$684,500.

4. The property known as 1523 N. Hollywood Street, Philadelphia, PA 19121 was also sold on or about December 5, 2023. This property was corporate owned. It was sold for \$229,000, which I believe was market value. There is no current Zillow estimate. It had been purchased on or about October 8, 2018, for \$129,000.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 29, 2024.



Safa Gelardi